



CITY OF STOCKTON

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COMMENTS ON ECONOMIC SUSTAINABILITY PLAN, AUGUST 9, 2011 DRAFT

Thank you for meeting with me and my senior staff on August 23rd to provide our comments on the draft Economic Sustainability Plan for the Sacramento-San Joaquin Delta (Plan). This letter is a brief summary of a few of the major points from that discussion.

With regard to your discussion in the Plan about our Delta Water Supply intake structure on Empire Tract, we agree with and support your discussion of the issues. Potential abandonment and flooding of Empire Tract is simply not an option. We support your comments discussing the potential levee maintenance requirements of being on the east end of a proposed inland sea. While Stockton's new water treatment facility is designed as a state-of-the-art treatment facility, able to provide high quality drinking water, your comments about treatment costs associated with additional organic carbon are supported. In general, we are very concerned about many of the options for Delta restoration and water conveyance that could have significantly negative impacts on the water quality at our intake facility.

In your discussions about wastewater discharges into and upstream of the Delta, we are concerned that your comments are painted with a wide brush. We are concerned about your statement on Page 168 that "[m]ost Delta communities discharge treated wastewater ... reducing Delta water quality for human use." In 2007, the City of Stockton completed a major upgrade to our facility. Stockton's Regional Wastewater Control Facility discharges water meeting the requirement of Title 22 of the California Code of Regulations. As noted in our discharge permit, this water may be used for undiluted irrigation of food crops and/or for body-contact water recreation. One



example of our success is found in the Final Report, Stockton Deep Water Ship Channel Demonstration Dissolved Oxygen Aeration Facility Project. That report states that "[t]he Aeration Facility can ...increase the DWSC DO by about 1 mg/l, ... enough to maintain the DO objectives... because the major source of inflow BOD has been eliminated since 2007 with the completion of the City of Stockton's RWCF nitrification facility."

Our third general area of interest is the nature of the urban settings in contrast with the Primary Zone of the Delta. We agree with your decision to focus on the Primary Zone. The Delta Reform Act noted that the co-equal goals "shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place." Certainly, the legislature was not thinking about downtown Stockton when that statement was written. As we noted, 51% of the City of Stockton is in the legal Delta. Consequently, Stockton has approximately 26% of the Delta residents (on less than 3% of the area of the Delta). We are concerned that the Economic Sustainability Plan, the Delta Stewardship Council's Delta Plan, the Bay Delta Conservation Plan, and other Delta efforts do not clearly distinguish between the "Delta as an evolving place," which we suspect is really the Primary Zone, and urbanized areas of the Secondary Zone such as the west half of Stockton. We suggest that the Delta Protection Commission through the Economic Sustainability Plan (and other Delta bodies through their various documents) consider the implications of developing regulatory schemes that are designed for the Primary Zone but could have significant negative impacts on existing urban areas in the Secondary Zone.

Again, thank you for allowing us to comment on the Plan. We look forward to your next draft.

Sincerely,



Jeff Willett, P.E., BCEE
Interim Director of Municipal Utilities

JW:bg

cc: Michael Locke, Deputy City Manager